IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 334-0502

Philip E. Batt, Governor

July 7, 1995

CERTIFIED MAIL #P 875 704 099

Jerry Spray, Sandpoint Facility Manager
Louisiana-Pacific Corporation
P.O. Box 249
Sandpoint, Idaho 83864

RE: Issuance of Tier II Operating Permit (#017-00003) for Louisiana-Pacific Corporation (Sandpoint Facility) - RACT/RACM Implementation for the Attainment Date Extension Project

Dear Mr. Spray:

In accordance with the requirements of the Sandpoint PM_{10} SIP and the Attainment Date Extension Project, the Division of Environmental Quality (DEQ) is issuing Tier II Operating Permit #017-00003 for Louisiana-Pacific Corp. (L-P) Sandpoint, Idaho facility. The enclosed permit reflects the revised PM_{10} emissions inventory and analysis that L-P and DEQ developed in response to the June through August 1994, public comment period.

Upon review of the operating permit you will note that DEQ altered portions of the proposed operating permit according to L-P's comments and EPA's comments. Several of the permit conditions and limits were not altered as requested in L-P's June 16, 1995, and June 23, 1995, public comment submittals on the proposed Tier II Operating Permit. At the present time, DEQ cannot investigate this topic further due to severe time contstraints for issuing the operating permits. A more complete explanation of DEQ's actions will be provided to you in DEQ's response package to public comment on the Tier II operating permits. The response package is expected to be issued on approximately July 24, 1995.

DEQ stresses that options exist with one or more Permit to Construct modifications to address outstanding issues in L-P's public comments that L-P may feel have not been addressed. Several of L-P's public comments included increased throughput requests that would require remodeling of the SIP emissions inventory. As a result, DEQ would be legally required to once again revise the Tier II Operating Permits and the newly-revised SIP plan and submit both for another public comment review. If this were to occur, an extension of the attainment date for the Sandpoint "moderate" PM_{10} nonattainment area would not be granted by EPA, and the area would be redesignated a "serious" PM_{10} nonattainment area. The redesignation will also occur if one or more of the four affected industrial facilities contests the issuance of their Tier II Operating Permit.

Please note that the term *Contingency Control Measures*, and variations thereof, has been officially changed to *Conditional Control Measures* due to a conflict with a legally recognized term in the the Clean Air Act. The redesignation of the reference name for the additional PM_{10} control measures proposed by L-P does not alter in any way the terms or conditions of this Operating Permit.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Brian R. Monson, Chief, Operating Permits Bureau, at (208) 334-5898.

Sincerely,

Martin Bauer for ODG

Orville D. Green
Assistant Administrator
Permits and Enforcement

ODG\BRM\DAM:jrj...\letters\l-p_issu.cov

Enclosure

cc: D. Redline, NIRO
COF
D. Cole, EPA-IOO
Mike McGown, CP
Source File
L. Kronberg, AG

STATE OF IDAHO
AIR POLLUTION
OPERATING PERMIT

GENERAL INFORMATION

PERMIT NUMBER 017 - 00003

AQCR 063

CLASS A1

SIC ~~3273~~ 2421

ZONE 11 **UTM COORDINATE (km)** 533.3, 5347.5

1. **PERMITTEE**
   Louisiana-Pacific Corporation

2. **PROJECT**
   Planing Mill/Sandpoint PM_{10} State Implementation Plan
   Tier II Operating Permit (RACT/RACM Implementation)

3. **ADDRESS** P.O. Box 249	**TELEPHONE #** (208)263-3145	**COUNTY** Bonner
4. **CITY** Sandpoint	**STATE** Idaho	**ZIP CODE** 83864
5. **PERSON TO CONTACT** Jerry Spray	**TITLE** Sandpoint Manager	

6. **EXACT PLANT LOCATION** 808 North Boyer Road
   Map location: NW 1/4 SE 1/4, Sec. 15 T57N R2W

7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
   Dimensional Kiln-Dried Lumber Production

8. **GENERAL CONDITIONS**

This permit is issued according to the **Rules for the Control of Air Pollution in Idaho**, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION PRESENTED WITH ITS APPLICATION AND OTHERWISE MADE AVAILABLE TO THE DEPARTMENT. CHANGES IN DESIGN, OPERATION, OR EQUIPMENT THAT MAY RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MUST BE APPROVED IN ADVANCE BY THE DEPARTMENT.

M Bauer for ADG

ASSISTANT ADMINISTRATOR
DIVISION OF ENVIRONMENTAL QUALITY

ISSUED July 7, 1995
Date
EXPIRES July 7, 2000
Date

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Woodwaste Boiler

1. SOURCE DESCRIPTION

1.1 Process Description

The primary purpose of the woodwaste boiler is to produce steam heat to dry green lumber in the drying kilns. Green lumber is derived from off-site sources. Hog-fuel for the woodwaste boiler is derived primarily from off-site sources.

Woodwaste generated from other wood products industries is delivered by haul truck and unloaded into a woodwaste pit. The primary method of transferring woodwaste from the woodwaste pit to the fuel storage house is by a conveyor belt; although occasionally, a front end loader is used to haul woodwaste from the pit into the fuel storage house. The fuel storage house is a three-sided roofed structure. Within the fuel storage house, a hydraulic reclaimer feeds woodwaste by covered conveyor belt to the boiler metering bin. The Kipper & Sons woodwaste boiler is fed directly from the boiler meter bin. The Kipper & Sons boiler is designed to combust woodwaste with moisture content of approximately fifty percent (50%), as listed in its original Permit to Construct (PTC) application.

1.2 Control Description

Emissions from the boiler are controlled by a multiclone followed by an electrified filter bed (EFB). Emissions from the boiler are vented through the EFB stack. Emissions from the EFB pneumatic gravel cleaning system are controlled by a media baghouse vented through the media baghouse vent.

1.3 Equipment Specifications

1.3.1 Kipper & Sons Woodwaste Boiler

1.3.1.1 Permitted heat input capacity is 125 million British Thermal Units per hour (BTU/hr). Permitted production capacity is 75,000 pounds of steam per hour (lb steam/hr).

1.3.1.2 Year Manufactured: 1977, Serial #1018

1.3.1.3 Stack Parameters: Boiler is vented to the EFB stack.

1.3.2 Electrified Filter Bed (EFB)

1.3.2.1 EFB Configuration: Electrified filter bed using gravel filter as collection electrodes within two (2) 36,000 actual cubic feet per minute (ACFM) louvered conical hoppers.

1.3.2.2 Performance design characteristics: Rated capacity: 72,000 ACFM.

1.3.2.3 Serial #EFB FDC 75.

1.3.2.4 Stack parameters: Stack height is minimum of 18.3 meters. Stack area is 1.4 square meters.

AIR POLLUTION OPERATING PERMIT

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Planing Mill
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SOURCE

Woodwaste Boiler

1.3.3 EFB Cleaning System Baghouse

1.3.3.1 Baghouse configuration: Aeropulse; seventy-two (72) bags, each 4" diameter and 10' length.

1.3.3.2 Performance design characteristics: Operating pressure drop of approximately 5" Water Gauge.

1.3.3.3 Stack parameters: Stack height is minimum of 7.6 meters. Stack area 0.25 square meters.

2. EMISSION LIMITS

2.1 Particulate Matter (PM) emissions from the Kipper and Sons boiler stack shall not exceed 0.080 grains per standard dry cubic foot of effluent gas adjusted to eight percent (8%) oxygen by volume (IDAPA 16.01.01.676), nor shall they exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.2 Particulate Matter emissions with an aerodynamic diameter less than ten (10) microns (PM_{10}), carbon monoxide (CO), oxides of nitrogen (NO_x), sulfur dioxide (SO_2), and volatile organic compound (VOC) emissions from the Kipper and Sons boiler stack shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.3 Visible emissions from the woodwaste fired boiler stacks shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as determined by the Department's "Procedures Manual for Air Pollution Control" (IDAPA 16.01.01.625).

2.4 Visible emissions from the EFB media baghouse vent shall not exceed ten percent (10%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as determined by the Department's "Procedures Manual for Air Pollution Control".

3. OPERATING REQUIREMENTS

3.1 Maximum Operation Limits

Steam production is currently limited to 68,500 pounds of steam per hour (lbs steam/hr) as established by past performance testing. Operation at a higher steam production level will require the Permittee to successfully demonstrate compliance with the applicable hourly PM_{10} emission limit and grain loading standard.

3.2 Maintenance to the electrified filter bed (EFB) shall be performed if visible emissions from the Kipper and Sons boiler stack exceed ten percent (10%) opacity, as determined by the Department's "Procedures Manual for Air Pollution Control".

3.3 Maintenance to the EFB media baghouse shall be performed if visible emissions from the media baghouse vent exceed five percent (5%) opacity as determined by the Department's "Procedures Manual for Air Pollution Control".

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

017 - 00003

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SOURCE

Woodwaste Boiler

3.4 The Permittee shall develop an annual operating maintenance schedule for the electrified filter bed (EFB) to prevent unnecessary shutdowns of the EFB and to assure the Department that this air pollution control equipment will be operated optimally.

3.5 Pollution Control Equipment

Operation of pollution control equipment as listed in 1.3 of this permit section shall be continuous at all times with operation of the Kipper & Sons woodwaste boiler.

3.5.1 EFB Media Baghouse Pressure Drop

The pressure drop across the baghouse shall remain within the baghouse manufacturer's recommendations.

3.6 Conditional Control Measure

The Permittee shall, by no later than July 1, 1996, redirect the EFB baghouse vent from a horizontal to a vertical position.

4. TESTING AND MONITORING REQUIREMENTS

4.1 The in-stack continuous opacity monitoring system (COMS) shall be operated, calibrated, and properly maintained on the Kipper & Sons boiler stack, in accordance with 40 CFR 60.13; 40 CFR Part 60, Appendix B, Spec. 1.

4.1.1 COMS Manufacturer: Lear Ziegler, Model #1100.

4.2 The following operating rates (i.e., boiler steam production expressed as pounds of steam produced per unit time) shall be recorded and maintained on site for the most recent two (2) year period:

4.2.1 The maximum hourly steam production rate (i.e., pounds of steam produced per hour) per day.

4.2.2 The total hourly steam production and total hours of operation per day.

4.2.3 Total steam production (tons) and total hours of operation per six (6) month period.

4.3 The Permittee shall conduct annual source tests to measure particulate emissions with diameters less than ten (10) microns (PM_{10}) from the Kipper and Sons boiler stack using U.S. EPA Reference Method 5 and a Method 202 analysis for particulate "back-half catch." Annual PM_{10} source tests shall occur no later than twelve (12) months after issuance of this Operating Permit. Subsequent annual source tests shall be performed no later than twelve (12) months after the previous test. Visible emissions shall be observed during the test according to EPA Reference Method 9. The results shall be applied toward the demonstration of compliance with the PM and PM_{10} emission limits listed in Appendix A and the applicable State of Idaho grain loading standard.

The operating process weight rate (input) and steam production (i.e., pounds of steam produced per hour) shall be measured and recorded during the emission test.

AIR POLLUTION OPERATING PERMIT

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Louisiana-Pacific Corporation
Planing Mill
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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Woodwaste Boiler

5. REPORTING REQUIREMENTS

5.1 The Permittee shall submit hourly, daily, and annual data on operating rates to the Department in a semi-annual report.

5.2 A maintenance report shall be prepared stating the corrective actions taken when opacity has exceeded five percent (5%) in the case of the baghouse and ten percent (10%) in the case of the EFB for periods aggregating more than three (3) minutes in any sixty (60) minute period.

5.3 The Permittee shall maintain on file the continuously-recorded in-stack opacity data from the Kipper & Sons woodwaste boiler stack for the most recent two (2) year operating period. Access to these records shall be granted to Department representatives upon request.

5.4 The Permittee shall provide notice to the Department within ten (10) days of making the change required in 3.6 of this permit section.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

017 - 00003

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SOURCE

Natural Gas Boilers

1. SOURCE DESCRIPTION

1.1 Process Description

In the event that the woodwaste boiler is shut down, two (2) natural gas boilers supply steam to the dry kilns.

1.1.1 Manufacturer: Cleaver Brooks 400 HP (XZ). Model #CB7 60-400 (XZ), Rated Capacity: 14,000 lb steam/hr (each).

1.2 Controls

Emissions from the two (2) natural gas fired boilers are uncontrolled and each vents through a separate stack.

2. EMISSION LIMITS

2.1 Particulate matter (PM) emissions from the two (2) natural gas fired stacks shall each not exceed 0.015 grains per standard dry cubic foot of effluent gas adjusted to three percent (3%) by volume (IDAPA 16.01.01.677), nor shall they exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.2 Particulate matter emissions with aerodynamic diameters less than 10 microns (PM_{10}), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO_2), and volatile organic compound (VOC) emissions shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.3 Visible emissions from the natural gas fired boiler stacks shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as determined by the Department's "Procedures Manual for Air Pollution Control" (IDAPA 16.01.01.625).

3. OPERATING REQUIREMENTS

3.1 The maximum number of hours that each of the natural gas boilers is allowed to operate shall not exceed 720 hours per year (hr/yr) in a calendar year, as per the Permittee's Permit to Construct (PTC) application.

4. TESTING AND MONITORING REQUIREMENTS

4.1 The following information corresponding to operation shall be recorded and maintained on-site for the most recent two (2) year period:

4.1.1 The total monthly natural gas usage for each of the natural gas boilers.

4.1.2 Total steam production (tons) according to the following conversion factor:1400 Btu heat input per pound of steam produced.

4.1.3 The total number of hours per year determined by an annual rolling average.

AIR POLLUTION OPERATING PERMIT

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PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
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017 - 00003

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Natural Gas Boilers

5. REPORTING REQUIREMENTS

5.1 The Permittee shall submit hourly and annual data on operating rates to the Department in a semi-annual report.

ISSUED: July 7, 1995
EXPIRES: July 7, 2000

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AIR POLLUTION OPERATING PERMIT

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SOURCE

Pneumatic Conveyance

1. SOURCE DESCRIPTION

1.1 Process Description

The cyclones and related pneumatic equipment are used as a means of process control. The byproducts gathered from operation of this facility is of a very low moisture content. These byproducts are collected and transferred pneumatically to the Truck Bin (byproduct loadout bin) where it is transferred to haul trucks.

Dried lumber is removed from the kilns and planed to desired dimensions. Planer shavings are collected from the planing operation and are transported pneumatically to the Planer Cyclone where the shavings drop out into the Truck Bin. The Planer Cyclone is a point source of particulate matter (PM) and PM_{10} emissions.

From the planer, the lumber is conveyed to the end trimmer area where the lumber is sawed to desired length. Sawdust and trim ends are byproducts. Trim ends that are too small to be utilized at other off-site facilities are hogged and, like the sawdust, are pneumatically conveyed to the End Trim Cyclone. This cyclone will be removed by July 1, 1996. A Transfer Cyclone conveys this material to the Planer Cyclone where it joins the planer shavings stream for eventual deposition into the Truck Bin. The End Trim and Transfer Cyclones are point sources of PM and PM_{10} emissions. The planer cyclone's exhaust vent emissions are routed directly to the Truck Bin Baghouse, which is a source of PM_{10} emissions.

The byproduct captured by the Truck Bin Baghouse is shaken out and transferred to the Truck Bin via the closed-loop (does not exhaust to the atmosphere) Truck Bin Cyclone. A cut shop hog unit, that is only used intermittently, is routed to the Cut Shop Hog Cyclone. This closed-loop cyclone's ductwork connects to a target box above the Truck Bin. A vent is located on this target box which is assumed to provide pressure relief for the Cut Shop Hog Cyclone dropout, Planer Cyclone dropout, and the Truck Bin Cyclone dropout. This shall be referred to as the Truck Bin Vent.

1.2 Control Description

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM_{10}) are controlled by the End Trim Cyclone, the Transfer Cyclone, and the Truck Bin Baghouse. Point source emissions occur at the exhaust vent for each of the above control devices. The Truck Bin Vent is a source of uncontrolled fugitive PM and PM_{10} emissions.

1.3 Equipment Specifications

1.3.1 End Trim Cyclone

1.3.1.1 Manufacturer: Information not available.

1.3.1.2 Performance design characteristics: Not available.

1.3.1.3 Stack parameters: Vent height is a minimum of 13.7 meters with a minimum vent diameter of thirty (30) inches.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

017 - 00003

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Pneumatic Conveyance

1.3.2 Transfer Cyclone

1.3.2.1 Manufacturer: Information not available.

1.3.2.2 Performance design characteristics: Not available.

1.3.2.3 Stack parameters: Vent height is a minimum of 13.7 meters with a minimum vent diameter of thirty (30) inches.

1.3.3 Truck Bin Baghouse

1.3.3.1 Manufacturer: U.S. Metal Works, Inc.

1.3.3.2 Performance design characteristics: Not Available.

1.3.3.3 Manufacturer design specifications: 234 bags with a six (6) inch diameter.

2. EMISSION LIMITS

2.1 Particulate Matter emissions with an aerodynamic diameter less than ten (10) microns (PM_{10}) emissions from the End Trim Cyclone vent, Transfer Cyclone vent, Truck Bin Baghouse Vent, and Truck Bin Vent shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.3 Visible emissions from the End Trim Cyclone vent, Transfer Cyclone vent, Truck Bin Baghouse Vent, and Truck Bin Vent shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as determined by the Department's "Procedures Manual for Air Pollution Control" (IDAPA 16.01.01.625).

3. OPERATING REQUIREMENTS

3.1 Operation of the Truck Bin Baghouse shall be continuous at all times during operation of the planer, and end trim saws.

3.1.1 Baghouse Specifications

The baghouse shall be installed, operated, and maintained in accordance with the manufacturer's recommendations. All manufacturer's specifications, operating, and installation instructions shall be kept on site as long as the baghouse is used and shall be made available to Department representatives upon request.

3.1.2 Baghouse Pressure Drop

The pressure drop across the baghouse shall remain within the baghouse manufacturer's recommendations.

3.1.3 Air-to-Cloth Ratio

The air-to-cloth ratio shall not exceed 7.9:1 as per the Permittee's certified response submittal.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Pneumatic Conveyance

3.1.4 Operating Hours

Total actual production operating hours per week shall not exceed 120 hours. A "week" shall commence on Monday at 12 a.m. and end Sunday 11:59 p.m. Maximum daily production operation of these emissions units shall not exceed twenty (20) hours per day (hr/day).

3.2 Conditional Control Measures

The Permittee shall, by no later than July 1, 1996:

3.2.1 Redirect the Truck Bin Baghouse vent from a horizontal to a vertical position.

3.2.2 Remove the End Trim Cyclone. Concurrent with the removal of the End Trim Cyclone, the Permittee may replace the existing Transfer Cyclone with a cyclone of a larger size.

4. TESTING AND MONITORING REQUIREMENTS

4.1 Total weekly operating hours of the Truck Bin Baghouse, End Trim Cyclone, and Transfer Cyclone shall be recorded and maintained on-site for the most recent two (2) year period. The Permittee may record the number of hours of actual operation of the planer and trim saws to fulfill this recording requirement, and demonstrate compliance with the operating requirement listed in 3.1.4 of this permit section.

4.1.1 Conditional Control Measures

The recordkeeping requirement listed in 4.1 of this permit section shall be nullified upon the Permittee providing the certified notification specified in General Provision N of this permit.

5. REPORTING REQUIREMENTS

5.1 Information collected to ascertain whether limits of this permit are being met including, but not limited to, records related to operating schedule and throughput shall be kept in an easily accessible location at the permitted facility for at least two (2) years.

5.2 The Permittee shall provide notice to the Department within 10 days of making the changes required in 3.2 of this permit section.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

0 1 7 - 0 0 0 0 3

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Process Fugitive Emission Sources

1. SOURCE DESCRIPTION

1.1 Process Description

This section addresses process fugitive emission sources. These sources include the Truck Bin Loadout operation, Dry Kilns, and End Sealing Operation.

1.1.1 Truck Bin Loadout

Planer shavings and sawdust and hogged trim ends from the end trim saws conveyed pneumatically to the Truck Bin. Haul trucks are loaded with the wood byproduct material. The byproduct material possesses low moisture content due to kiln drying and sawing operations (in the case of sawdust) and is a source of fugitive PM and PM_{10} emissions resulting from the material transfer.

1.1.2 Dry Kilns

Green lumber is placed within the kilns and is dried using process steam from either the woodwaste boiler or the natural gas boilers. Fugitive volatile organic compound (VOC) and condensable PM_{10} emissions are created during the drying process.

1.1.3 End Sealing Operation

Once the finished lumber has been stacked and banded into shipping bundles, the ends of the lumber are sealed with a painting operation. The painting operation occurs in a partially enclosed structure. The paint has a low VOC content and is water-based.

1.1.4 Ash Handling

Fugitive PM and PM_{10} emissions are created during the material transfer of the woodwaste boiler ash for transport to the three-sided ash storage shed.

1.2 Control Description

1.2.1 Truck Bin Loadout

The truck bin loadout operation is partially enclosed with a two-sided structure.

1.2.1.1 Truck Bin Loadout Proposed Conditional Control Measure

The truck bin loadout operation shall be enclosed on three (3) sides with windproof material. The fourth side is to be constructed of heavy polyethylene strips that shall drape across the opening to provide as effective a seal as possible. The Permittee may incorporate a more efficient method of enclosing the fourth side of the enclosure to increase the enclosure's effectiveness.

AIR POLLUTION OPERATING PERMIT

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PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

017 - 00003

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Process Fugitive Emission Sources

1.2.2 Dry Kilns

VOC and condensable PM_{10} emissions are vented uncontrolled. Emissions from three of the kiln rooms are through ten (10) vents. Emissions from the remaining two kilns are through eight (8) vents.

1.2.3 End Sealing Operation

The end sealing operation occurs in an enclosure with a curtain wall twenty-five (25) feet by 6.5 feet. Negative pressure is provided by a vent fan.

1.2.3.1 End Sealing Loadout Proposed Conditional Control Measure

The Permittee shall replace the existing curtain in the outside wall of the end sealing application area with a wind resistant material. Negative pressure shall continue to be provided whenever the end sealing operation is in use.

1.2.4 Ash Handling

Woodwaste boiler ash shall be wetted with water prior to transfer to the three-sided ash storage structure.

2. EMISSION LIMITS

2.1 Particulate Matter emissions with an aerodynamic diameter less than ten (10) microns (PM-10) emissions for Truck Bin Loadout, Dry Kilns, End Sealing Application, and Ash Handling shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

2.2 Visible emissions from the Truck Bin Loadout operation, Dry Kiln vents, End Sealing Application operation, and Ash Handling shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period, as determined by the Department's "Procedures Manual for Air Pollution Control" (IDAPA 16.01.01.625).

3. OPERATING REQUIREMENTS

3.1 Truck Bin Loadout Maximum Throughput

3.1.1 The maximum throughput of planer shavings, sawdust, and hogged trim ends shall not exceed the quantities listed in Appendix B. Compliance with this limit shall be determined by establishing throughput on an annual rolling average.

3.1.2 The Permittee shall, by no later than July 1, 1996, install the Conditional Control Measures as described in 1.2.1.1 of this permit section.

3.2 Dry Kiln Maximum Throughput

The maximum throughput of lumber produced by the dry kilns shall be based on the amount of finished product created. The quantity of finished lumber produced shall not exceed the quantities listed in Appendix B.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

017 - 00003

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Process Fugitive Emission Sources

3.2.1 The Permittee may process green lumber through the facility. The quantity of finished board feet of product shall be included in the quantity of finished lumber product allowed in Appendix B. The green lumber product shall be tracked and recorded as required in 4.2 of this permit section.

3.3 End Sealing Operation

3.3.1 Paint used for the end coating operation shall contain one percent (1%) or less of volatile organic compounds (VOCs).

3.3.2 The Permittee shall, by no later than July 1, 1996, install the Conditional Control Measures as described in 1.2.3.1 of this permit section.

4. TESTING AND MONITORING REQUIREMENTS

4.1 Truck Bin Loadout Throughput

The Permittee shall monitor and record the monthly amounts of woodwaste transferred through the truck bin (tons per month). These records shall maintained on-site for the most recent two (2) year period.

4.2 Dry Kiln Throughput

Dry kiln throughput shall be monitored on the basis of finished product. The Permittee shall record the quantities of finished lumber produced (tons per month). These records shall maintained on-site for the most recent two (2) year period.

5. REPORTING REQUIREMENTS

5.1 The Permittee shall provide notice to the Department within 10 days of making the changes required in 3.1.2 and 3.3.2 of this permit section.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

017 - 00003

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Vehicle Fugitive Emission Sources

1. SOURCE DESCRIPTION

1.1 Process Description

This section of the permit includes fugitive emission sources. Sources of fugitive emissions include: vehicle traffic on paved and unpaved roads and material transfer points.

Lumber and woodwaste trucks, front end loaders, and other vehicles operate on the plant site. Lumber trucks haul rough cut green lumber to the lumber storage area on paved roads. Vehicle traffic at the plant site occurs primarily on paved roads. Woodwaste used to fuel the woodwaste boiler is delivered to the fuel storage shed by woodwaste trucks on paved and unpaved roads.

1.2 Control Description

Emissions resulting from traffic on unpaved roads and areas shall be controlled by applying dust suppressant and water to the roads. Emissions from vehicle traffic on paved roads are controlled by mechanical sweeping and/or flushing with water.

2. EMISSION LIMITS

2.1 Fugitive Emissions

Particulate Matter emissions with an aerodynamic diameter less than ten (10) microns (PM_{10}) emissions from these fugitive emission sources shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

3. OPERATING REQUIREMENTS

3.1 Speed Limit

All traffic shall be restricted to an average speed of five miles per hour (5 mi/hr) while traveling on unpaved roads within the facility.

3.2 Control Methods

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, as required in IDAPA 16.01.01.650.

3.2.1 All unpaved haul roads and front-end loader travel areas shall be treated with an environmentally safe chemical dust suppressant (ESCDS) at least once every thirty (30) days during the months of facility operation when roads are not frozen. In the event that facility operations cease for a period of greater than thirty (30) days, an initial ESCDS application shall precede the commencement of hauling materials into or out of the facility and front-end loader activity within the facility. The final ESCDS application shall occur no more than thirty (30) days prior to the cessation of such hauling and/or loading. The ESCDS shall be applied in sufficient quantities so as to provide reasonable control of fugitive dust from the unpaved haul roads and front-end loader travel areas.

3.2.2 In the event the Permittee elects not to apply an ESCDS to the unpaved haul road, the Permittee may apply water in place of the ESCDS in accordance with IDAPA 16.01.01.650 of the Rules for the Control of Air Pollution in Idaho. In this circumstance only haul trucks delivering hogged fuel and departing after delivering hogged fuel are permitted to use the unpaved haul road.

3.3 Conditional Control Measure

The Permittee shall, by no later than July 1, 1996, pave all remaining unpaved haul roads.

4. TESTING AND MONITORING REQUIREMENTS

4.1 Chemical Dust Suppressant Application Plan.

4.1.1 The Permittee shall develop and keep current a Chemical Dust Suppressant Application Plan (CDSAP). The CDSAP shall include:

4.1.1.1 Brand name and chemical composition of the ESCDS selected for use.

4.1.1.2 Proposed dilution ratio (volume of water: volume of ESCDS) to be used in the formation of each ESCDS solution ready for direct application.

4.1.1.3 Projected dates of ESCDS solution application.

4.1.1.4 Proposed application intensity, in gallons per square yard (gal/yd^2), of the ESCDS solution for each projected treatment date.

4.1.1.5 Facility plot plan illustrating the proposed treatment areas.

4.1.2 The Permittee shall notify the Department in writing of any changes in an existing CDSAP at least 30 days prior to the proposed date of change.

4.2 ESCDS Application Log

The Permittee shall record the following information each time the ESCDS is applied (i.e., every thirty (30) days during the operating season).

4.2.1 Brand name and chemical composition of the ESCDS used.

4.2.2 Dilution ratio (volume of water: volume of ESCDS) used to form the ESCDS solution ready for direct application.

4.2.3 Date of ESCDS solution application.

4.2.4 Application intensity (gal/yd^2) of the ESCDS solution.

4.2.5 Facility plot plan illustrating the treated areas.

4.2.6 Name of the firm and of the operator responsible for the ESCDS solution application. The operator shall initial these required records to verify their accuracy.

AIR POLLUTION OPERATING PERMIT

PERMITTEE AND LOCATION

PERMIT NUMBER

Louisiana-Pacific Corporation
Planing Mill
Sandpoint, Idaho

017 - 00003

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Vehicle Fugitive Emission Sources

5. REPORTING REQUIREMENTS

5.1 Chemical Dust Suppressant Application Plan

5.1.1 A copy of the CDSAP shall be made available to Department representatives upon request.

5.1.2 The Permittee shall notify the Department in writing of any changes in an existing CDSAP at least thirty (30) days prior to the proposed date of change.

5.2 ESCDS Application Log

5.2.1 A copy of the ESCDS Application Log shall be maintained on-site for the most recent two (2) year period.

5.2.2 Access to these records shall be made available to Department representatives upon request.

5.3 The Permittee shall provide notice to the Department within ten (10) days of making the changes required in 3.3 of this permit section.

APPENDIX A

TABLE 1

Louisiana Pacific, Sandpoint Planing Mill

PM_{10} Emission Limits[a] - Hourly (lb/hr), and Annual[b] (T/yr)

Source Description	Hourly PM_{10}[c] Emissions (lb/hr) before 7/1/96[d]	Annual PM_{10}[c] Emissions (T/yr) before 7/1/96[d]	Annual PM_{10}[c] Emissions (lb/hr) after 7/1/96[d]	Annual PM_{10}[c] Emissions (T/yr) after 7/1/96[d]
Kipper & Sons Woodwaste Boiler	6.93	30.4	6.93	30.4
EFB Baghouse Vent	0.23	1.02	0.23	1.02
Natural Gas Boiler #1	0.22	0.08	0.22	0.08
Natural Gas Boiler #2	0.22	0.08	0.22	0.08
Truck Bin Baghouse Vent	1.24	3.86	1.24	5.42
Transfer Cyclone	1.03	3.21	1.03	4.51
Trim Saw Cyclone	0.51	1.60	0.00	0.00
Lumber Drying Kilns (5 kiln rooms)	3.04	13.3	5.1	22.5
Woodwaste Boiler Ash Handling	0.11	0.40	0.16	0.68
Truck Bin Loadout Operation	1.80	6.59	0.51	2.23
Truck Bin Vent	0.15	0.56	0.14	0.63
End Coating Operation	0.25	0.90	0.10	0.46
Vehicle Traffic - Unpaved Areas	0.14	0.52	0.00	0.00
Vehicle Traffic - Paved Areas	0.23	0.84	0.36	1.56

a As determined by a pollutant specific U.S. EPA reference method, or a Department approved alternative, or as determined by the Departments's emission estimatio methods used in this permit analysis.

b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the processes may operate(s), or by actual annual production rates.

c Includes condensables.

d Or such earlier date as all required Conditional Control Measures have been completed.

ISSUED: July 7, 1995
EXPIRES: July 7, 2000

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APPENDIX A

TABLE 2

Louisiana Pacific, Sandpoint Planing Mill

Emission Limits[a] - Hourly (lb/hr) and Annual[b] (T/yr)

Source Description	PM[c]		NO_x		CO		VOC		SO_2	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
1. Kipper & Sons Woodwaste Boiler	6.93	30.4	15.6	56.4	60.0	201.6	7.8	28.2	0.84	3.03
2. Natural Gas Boiler #1	0.23	0.08	2.4	0.86	0.60	0.22	0.04	0.02	0.01	0.004
3. Natural Gas Boiler #2	0.23	0.08	2.4	0.86	0.60	0.22	0.04	0.02	0.01	0.004

a As determined by a pollutant specific U.S. EPA reference method, or a Department approved alternative, or as determined by the Departments's emission estimation methods used in this permit analysis.

b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

c Includes condensables.

ISSUED: July 7, 1995
EXPIRES: July 7, 2000

APPENDIX B

Louisiana Pacific - Sandpoint Planing Mill

Maximum Throughput Values

Source Description	Material Handled	Maximum Annual Units before 7/1/96[a]	Maximum Annual Units after 7/1/96[a]
1. Kipper & Sons Woodwaste Boiler	Hogged Fuel	56,000 tons (as delivered)	56,000 tons (as delivered)
2. Finished Product Loadout	Finished Lumber	143 MMbd ft[b]	200 MMbd ft[b]
3. Truck Bin Loadout	Planer shavings, sawdust, and hogged trim ends	26,540 tons	37,150 tons

a Or such earlier date as all required Conditional Control Measures have been completed.

b Where MMbd ft means million board feet

ISSUED: July 7, 1995
EXPIRES: July 7, 2000

OPERATING PERMIT GENERAL PROVISIONS

A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the **Rules for the Control of Air Pollution in Idaho**, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.

B. The Permittee shall at all times (except as provided in the **Rules for the Control of Air Pollution in Idaho**) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.

C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:

1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and

2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.

D. Except for data determined to be confidential under Section 39-111, **Idaho Code**, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.

E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.

F. If emission testing is specified, the Permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial startup. Such testing must **strictly** adhere to the procedures outlined in the Department's **Procedures Manual for Air Pollution Control**, and will not be conducted on weekends or state holidays. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least fifteen (15) working days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The performance tests will be performed at the maximum production rate. If this maximum rate is not achieved during testing, the allowable production rate will be limited to the production rate attained during testing.

G. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

H. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

I. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.

J. The Permittee shall provide the Department a minimum of ten (10) working days' notice prior to the scheduled date of any emissions test required pursuant to this permit. The Permittee shall notify the Department of any change in the testing schedule and shall provide at least one (1) working day's notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

K. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

L. Operation information shall include daily and annual hours of operation, and process throughput rate(s) as applied to development of permit conditions.

M. Any records of performance tests, and any other information collected to ascertain whether limits of this permit are being met shall be kept in an easily accessible location at the permitted facility for at least two (2) years. Access to this information shall be granted to Department representatives upon request.

The Permittee shall submit a test protocol for any performance test to be conducted to the Department for approval at least thirty (30) days prior to each test date. Each performance test report, including related process data, shall be submitted to the Department within thirty (30) days of the date on which the performance test is conducted.

N. The term "Conditional Control Measures" shall mean the additional pollution control equipment and/or practice(s) that the Permittee has proposed to adequately install and successfully incorporate into normal operations. The Permittee is required to follow all manufacturer's instructions for the installation, maintenance, and operation of the equipment and/or practice(s).

The date which the Permittee must have all proposed Conditional Control Measures in place and performing in a satisfactory manner is July 1, 1996. If the Department does not receive certified notification from the Permittee by July 1, 1996, Conditional Control Measures will not be accepted as being in place, and therefore, emission limits, throughput limits, and process requirements will remain as currently-effective.

The Permittee shall provide certified notification of completion of Conditional Control Measure installation by the designated facility manager. The notification shall be submitted in accordance with IDAPA 16.01.01.123 and 124 and shall state, and thus certify, that "*...based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.*" The certified notification shall be sent to the following:

Brian R. Monson, Chief
Operating Permits Bureau
Permits and Enforcement
Division of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1290

ISSUED: July 7, 1995
EXPIRES: July 7, 2000